

U.S. DISTRICT COURT
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2020 SEP -9 P 1:19

CLERK OF COURT

20-CR-157

UNITED STATES OF AMERICA,

Plaintiff,

v.

NEIL A. FRANK,

Defendant.

Case No. 20-CR-

[18 U.S.C. §§ 1470, 2422(b),
and 2260A]

Green Bay Division

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between approximately May 12, 2020, and May 18, 2020, in the State and Eastern
District of Wisconsin,

NEIL A. FRANK,

using a facility and means of interstate commerce, did knowingly attempt to persuade, induce,
entice, and coerce a person who had not yet attained the age of 18 years to engage in sexual
activity for which the defendant could be charged with a criminal offense, namely, sexual contact
and sexual intercourse in violation of Wisconsin Statute 948.02(2) (second-degree sexual assault
of a child).

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2020, in the State and Eastern District of Wisconsin,

NEIL A. FRANK,

using a facility and means of interstate and foreign commerce, knowingly attempted to transfer obscene matter to another individual whom he knew had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between approximately May 12, 2020, and May 18, 2020, in the State and Eastern District of Wisconsin,

NEIL A. FRANK,

an individual who has a prior conviction for attempted possession of child pornography in the State of Wisconsin, and who is required by Federal or other law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 2422(b), as charged in Count One of this indictment.

In violation of Title 18, United States Code, Sections 2260A and 3559(e).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2020, in the State and Eastern District of Wisconsin,

NEIL A. FRANK,

an individual who has a prior conviction for attempted possession of child pornography in the State of Wisconsin, and who is required by Federal and State of Wisconsin law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 1470, as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Sections 2260A and 3559(e).

FORFEITURE NOTICE

Upon conviction of Counts One and Two in the indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, United States Code, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offenses, including, but not limited to, the following:

1. Any other equipment, instrumentalities, and items used or intended to be used in the transportation, shipment, production, receiving, distribution, or possession of child pornography.

A TRUE BILL:


FOREPERSON

Dated: 9/9/20

Fr 
MATTHEW D. KRUEGER
United States Attorney